

March 8, 2012

Clerk of the Board  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814



**Re: Ferrari San Francisco Supports the 15-Day Notice to the ZEV and LEVIII Amendments**

Ferrari of San Francisco respectfully submits comments on the "15 Day Notice of Amendments to the California Zero Emission Vehicle Program Regulations and the Proposed 'LEVIII' Amendments to the California Greenhouse Gas, Criteria Pollutant Exhaust and Evaporative Emission Standards and Test Procedures, and to the On-Board Diagnostic System Requirements for Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles, and to the Evaporative Emission Requirements for Heavy-Duty Vehicles" ("15-Day Notice"), released by the California Air Resources Board ("ARB") for public comment on February 22, 2012.

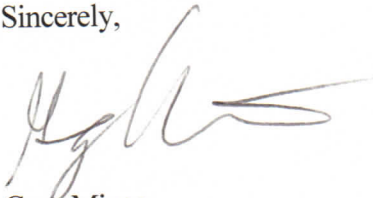
Ferrari of San Francisco is an authorized Ferrari dealer located in Mill Valley, California, and submitted supportive comments on the underlying regulations that these rules revise. California is Ferrari's largest U.S. market, about 20-25% of Ferrari's total U.S. sales each year - about 400-500 vehicles state-wide. Therefore, the ability to sell vehicles in California is critical to Ferrari's continued presence in the United States vehicle market and to my business.

Ferrari of San Francisco greatly appreciates the inclusion of a definition in the proposed 15-Day Notice that would allow a small volume manufacturer ("SVM") to demonstrate that it is "operationally independent" from other related manufacturers with which its sales otherwise would have to be aggregated under the California regulations. The operational independence criteria, which were also proposed by the Environmental Protection Agency and the National Highway Traffic Safety Administration in the *2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards*, 76 Fed. Reg. 74,854, 74,992 (Dec. 1, 2011), will maintain consistency and uniformity between the federal and California programs. The revised language will provide necessary flexibility for very small manufacturers, minimize opportunities for improperly taking advantage of the system, and maintain strong environmental protections.

However, Ferrari of San Francisco urges ARB to make an additional change to the regulatory language before finalizing the text. Under the 15-Day Notice as proposed, Ferrari would immediately become part of a related manufacturer's fleet for the 2013 model year, and would have to begin complying with more stringent exhaust and evaporative emission standards with little prior notice. Such a requirement at short notice to the companies involved could create great logistical and practical difficulties.

Thank you for listening to our concerns and for your actions on this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Greg Minor', with a stylized flourish at the end.

Greg Minor  
President, Ferrari of San Francisco  
(415) 380-9700